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*Attorneys for Defendant
Wal-Mart Stores, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SUZY MCCABE,

Plaintiff,

v.

WAL-MART STORES, INC., WALMART
NEIGHBORHOOD MARKET, DOE
MAINTENANCE EMPLOYEE, DOE
EMPLOYEE, DOE JANITORIAL
EMPLOYEE, DOE OWNER, I-V, ROE
EMPLOYER, and ROE COMPANIES,

Defendants.

Case No.: 2:14-01987-JAD-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES**

[FIRST REQUEST]

Comes now Plaintiff SUZY MCCABE (“Plaintiff”) and Defendant WAL-MART STORES, INC. (“Walmart”), by and through their respective counsel of record, and hereby stipulate to the extension of all remaining discovery deadlines by thirty days. The parties therefore propose the following revised discovery plan.

Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the first such discovery extension requested in the matter.

DISCOVERY COMPLETED TO DATE

The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures. Both parties have propounded written discovery requests—including interrogatories, requests for admission and requests for production. Both parties have answered

propounded written discovery requests. Plaintiff's FRCP 35 Independent Medical Evaluation was held on Friday, May 22, 2015. The parties have scheduled Plaintiff's deposition for Tuesday, June 9, 2015.

**DISCOVERY TO BE COMPLETED AND
REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes: additional written discovery; deposition of fact witnesses; depositions of Plaintiff's treating physicians; disclosure of expert witnesses; depositions of expert witnesses and rebuttal expert witnesses.

Despite the good faith efforts of the parties to comply with the Court's discovery deadlines, Plaintiff was unavailable for a Rule 35 Independent Medical Evaluation until May 22, 2015. The delay in conducting the Rule 35 Independent Medical Evaluation in conjunction with the voluminous amount of medical records the parties' respective experts must review constitute good cause for a thirty day extension of all remaining discovery deadlines by thirty days.

[PROPOSED] NEW DISCOVERY DEADLINE

Expert Disclosure Deadline

Current: June 3, 2015
Proposed: July 3, 2015

Rebuttal Expert Disclosure

Current: July 3, 2015
Proposed: August 3, 2015

Interim Status Report

Current: June 3, 2015
Proposed: July 3, 2015

Dispositive Motions

Current: September 3, 2015
Proposed: October 5, 2015

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Pre-Trial Order

Current: October 2, 2015
Proposed: November 2, 2015

Discovery Cut-off Date

Current: August 3, 2015
Proposed: September 2, 2015

If this extension is granted, all anticipated additional discovery should be concluded within its stipulated extended deadlines. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

Dated this 27th day of May, 2015.

/s/ Adrian Karimi
Adrian Karimi
Nevada Bar No. 13514
MORRIS ANDERSON LAW FIRM
716 S. Jones Blvd.
Las Vegas, NV 89107

Attorneys for Plaintiff
Suzy McCabe

Dated this 27th day of May, 2015.

/s/ Brenda H. Entzminger
Brenda H. Entzminger
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504 South Ninth Street
Las Vegas, NV 89101

Attorneys for Defendant
Wal-Mart Stores, Inc.

ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: May 28, 2015

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of May, 2015, I served a true and correct copy of the foregoing, **STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY DEADLINES, [FIRST REQUEST]**, by facsimile and by U.S. Mail, in a sealed envelope, first-class postage fully prepaid, addressed to the following counsel of record, at the address listed below:

ATTORNEY OF RECORD	TELEPHONE/FAX	PARTY
RYAN M. ANDERSON, ESQ. Nevada Bar No. 11040 KIMBALL JONES, ESQ. Nevada Bar No. 12982 MORRIS ANDERSON 716 S. Jones Blvd. Las Vegas, NV 89107	Phone 702-333-1111 Fax 702-507-0092	Plaintiff

/s/ Amtoj S. Randhawa

An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC